

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ANTHONY RIGGINS,	:	Case No. 1:01-CV-503
	:	
Plaintiff,	:	Judge Barrett
	:	
vs.	:	
	:	
FORREST HUNT, et al.,	:	<u>DECLARATION OF JENNIFER</u>
	:	<u>L. BRANCH IN SUPPORT OF</u>
	:	<u>PLAINTIFF'S MOTION FOR</u>
Defendants.	:	<u>ATTORNEY FEES</u>

I, Jennifer L. Branch, pursuant to 28 U.S.C. §1746, declare under the penalty of perjury under the United States of America that the following is true and correct.

1. I was the lead trial attorney in this case. This declaration is submitted in support of the plaintiffs' application for fees. Exhibit B sets forth all hours incurred by Alphonse A. Gerhardstein, our law clerks, paralegals, law graduate and myself and it sets forth all expenses and costs.

2. The time sheets attached are an accurate representation of the services performed on behalf of the plaintiffs in this action by Alphonse A. Gerhardstein, our paralegal, our law clerks, our law graduate and myself. Time records were kept contemporaneously with the services being rendered.

3. I received my undergraduate degree from New York University in 1984, graduating with honors. I am a graduate of the Case Western Reserve University School of Law, graduating *cum laude*. I received my J.D. degree in 1987 and have been admitted to practice in Ohio and the Southern District of Ohio since 1987. Since 1987, my practice has been dedicated to poverty law and civil rights litigation. In 1998 I was admitted the Sixth Circuit Court of Appeals and in 2005 I was admitted to practice in the

U.S. Supreme Court.

4. I served as a Senior Attorney at the Legal Aid Society of Cincinnati from 1992 – 1996 and as a staff attorney for that same organization from 1987-1992. At Legal Aid my practice included discrimination, housing, and prison litigation. I co-counseled six class actions or complex cases at Legal Aid.

5. In July 1997 I joined the private law firm of Laufman & Gerhardstein, as an attorney. Laufman & Gerhardstein concentrates its practice on civil rights litigation. I have co-counseled with Alphonse Gerhardstein and Robert Laufman on several dozen civil rights cases. In January 2005 I became a partner in the firm.

6. A list of the significant cases I have litigated is contained in my resume, attached as Ex. A.

7. In the vast majority of my cases, including this case, my fee is contingent or dependent on success.

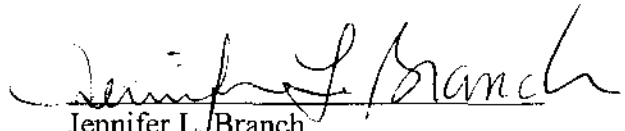
8. My billing rate was \$250 per hour since January 2002. I have been awarded fees at that rate, settled cases at that rate, and had clients pay me at that rate for two years. In 2004 I increased my billing rate to \$275 per hour and have settled cases and had clients pay me at that rate since 2004.

9. The billing rate for our law graduate Michele Berry is \$85 per hour. Out law clerks and paralegal rates are billed at \$65 per hour. The paralegal is a college graduate and has more than two years experience as a litigation paralegal. The paralegal rate of \$65 per hour is reasonable in light of the fees awarded to the paralegals, which ranged from \$60 to \$85 per hour in *McDaniel and Kammer v. City of Cincinnati*, U.S.D.C. No 99-CV-325, (Judge Susan Dlott).

10. I served as lead attorney on this case. I investigated the case, conducted all paper discovery, took numerous depositions of defendants and witnesses, and defended Plaintiff's deposition. I drafted most pleadings and directed all support staff work on the case. In addition, I co-counseled the first trial and tried the second trial without assistance. Mr. Gerhardstein edited pleadings, was involved in trial strategy throughout the litigation, and was lead trial lawyer in the first trial. His current billing rate is \$375 per hour.

11. I exercised billing judgment at the time the time was recorded and have deleted entries from the time sheets, so compensation is not sought for all the work performed.

12. Our firm has incurred expenses connected with this litigation. Attached hereto is a summary of those expenses. I request an award of \$6,311.33 to cover the expenses in this litigation. Invoices and receipts will be made available to opposing counsel upon request.


Jennifer L. Branch
Date: 8/30/06

JENNIFER L. BRANCH
GERHARDSTEIN BRANCH & LAUFMAN CO. LPA

617 Vine Street, Suite 1409
Cincinnati, OH 45202
513-621-9100 ext. 13
fax: 513-345-5543
jbranch@GBLfirm.com

EDUCATION

May 1987 **CASE WESTERN RESERVE UNIVERSITY SCHOOL OF LAW**
Cleveland, Ohio
J.D. Degree; *cum laude*
Health Law Journal Editor; Moot Court Board
Honors: Order of the Barrister; American Jurisprudence Awards for
Trial Practice, Administrative Law, and Conflict of Laws
Publication: "The Right to Withdraw Life-Sustaining Medical Treatment,"
Health Matrix Vol. III, No. 4 (1986)

May 1984 **NEW YORK UNIVERSITY**
New York, New York
B.A. Degree with Honors in Politics
Majors: Politics and Philosophy

LEGAL EMPLOYMENT

Jan. 2005- present **PARTNER**
GERHARDSTEIN BRANCH & LAUFMAN CO. LPA
Gerhardstein Branch & Laufman Co. LPA is a private civil rights litigation firm. We represent plaintiffs discriminated against on the basis of age, race, gender, sexual orientation, and disability in the areas of private and public employment. We also litigate prisoner civil rights cases, police misconduct cases, and women's reproductive rights issues.

June 1997- 2004 **ATTORNEY**
LAUFMAN & GERHARDSTEIN

Sept. 1992-June 1996 **SENIOR ATTORNEY**
Sept. 1987-Sept. 1992 **STAFF ATTORNEY**
LEGAL AID SOCIETY OF CINCINNATI
Represented low income clients in prison litigation, subsidized and private housing cases, utility rate cases, race, gender, handicap and familial discrimination, special education, and benefits.

LITIGATION

I have litigated cases in federal and state court trial courts, Ohio Courts of Appeals, Ohio Supreme Court, Sixth Circuit Court of Appeals, and Ohio administrative agencies. Below is a partial list of significant cases:



Riggins v. Hunt, (S.D. Ohio 2006) (Judge Barrett) jury verdict for Plaintiff for \$125,000 in prisoner civil rights action against state prison corrections officers for using excessive force.

Cundiff v. Mueller, (S.D. Ohio settled 2006) excessive force case against New Vienna police officer who shot and killed client and against Village and officers for covering up his crime. Case settled for \$950,000.

Kemper v. City of Milford, (S.D. Ohio settled 2005), substantive due process case on theory of state created danger against police officer who sent husband to home of man sleeping with the husband's wife. Summary judgment denied; case settled for \$200,000.

Jack Doe v. Butler County, Ohio (S.D. Ohio settled 2005), prisoner civil rights case for failure to protect boy raped at the Butler County Juvenile Detention Center; case settled for \$250,000.

Spencer v. Blackwell, (S.D. Ohio 2004) (Judge Dlott) elections case enjoining Republican challengers to democratic voters in African American precincts in Cincinnati in the presidential 2004 election and challenging the constitutionality of Ohio's challenger law. Injunction stayed on appeal 388 F.3d 547 (6th Cir.), stay affirmed *Spencer v. Pugh*, 125 S.Ct. 305 (2004)(Justice Stewart)

Meyers v. Booher, (Hamilton County Common Pleas Court 2004) (Judge Martin) bench verdict of \$130,000 for parents and teenage daughter who was seduced by her boss and harbored from her parents.

Herbert v. Milford Towing, (S.D. Ohio 2003) (Judge Hogan) jury trial on behalf of male employee sexually harassed by male supervisor (settled before verdict).

Johnny Roe v. Butler County, Ohio (S.D. Ohio 2003) (Judge Beckwith) settlement for \$200,000 in prisoner civil rights case on behalf of 11 year old boy raped at the Butler County Juvenile Detention Center.

Women's Professional Medical Corp. v. J. Nick Baird, 277 F. Supp.2d 862 (S.D. Ohio 2003) (Judge Marbley), Permanent Injunction obtained for abortion provider who was ordered by the Ohio Department of Health to cease and desist operations. ODH was undue burden on a woman's right to choose and a violation of due process. Attorney fees awarded. Affirmed in part 438 F. 3d. 595 (6th Cir. 2006)

Pancake v. McGowan, 64 Fed. Appx. 464 (6th Cir. 2003) (Judge Dlott), due process challenge to Lawrence County, Ohio judge's practice to grant *ex parte* TROs granting marital residence and property to first party in divorce case to file motion. Case was dismissed on *Rooker-Feldman* abstention grounds.

Philecia Barnes formerly known as Phillip Barnes v. City of Cincinnati, jury verdict for plaintiff (\$150,000 compensatory damages, \$30,000 back pay and \$120,000 front pay) February 26, 2003(S.D.OH) (Judge Dlott), for employment discrimination against transsexual police officer. Jury found City discriminated against transsexual police officer in violation of Title VII because of gender stereotyping and in violation of the Equal Protection clause for discrimination based on

perceived sexual orientation, cross dresser, transgender, or non conformity with sex stereotypes. Attorney fees with 1.75 multiplier for extraordinary results awarded. Affirmed 401 F.3d 729 (6th Cir. 2005), rehearing en banc denied (Jun 08, 2005), cert. denied 126 S.Ct. 624, summary judgment denied at 2002 U.S. Dist. LEXIS 26207.

In re Founder's Women's Health Center v. Ohio Department of Health, 2002-Ohio-4295 (10th Dist. Court of Appeals 2002), 2002 WL 1933886 (Ohio App. 10 Dist.). Administrative challenge to ODH requirement that doctor owned abortion clinics must be licensed as Ambulatory Surgical Facilities.

Greene v. Bowles, case settled after summary judgment for warden reversed by 361 F.3d 290 (6th Cir. 2004); jury verdict for defendant April 2002 (S.D.OH) (Judge Beckwith), transsexual prisoner beaten by inmate lost at trial on claim against officer for failure to protect her from harm. Qualified immunity denied to officers. *Doe v. Bowles*, 254 F.3d 617 (6th Cir. 2001).

Riester v. Riverside Community School, charter school teacher sued for violation of her first amendment rights, court held charter school and charter school principal are state actors reported at 257 F.Supp.2d 968 (S.D.OH 2002) (Judge Spiegel). Case settled for an undisclosed amount.

Women's Medical Professional Corporation v. Taft, trial 2001, successful constitutional challenge to Ohio House Bill 351, the "partial birth abortion" law reversed on appeal. Decisions reported at 199 F.R.D. 597 (S.D. Ohio 2001) (Judge Rice) (extending TRO); 114 F. Supp.2d 694 (S.D.OH 2000) (preliminary injunction); 162 F. Supp.2d. 929 (S.D. OH 2001) (permanent injunction); 353 F.3d 436 (6th Cir 2003) reversed.

Culberson v. Doan, 1997 – 2001, civil rights claim against police chief and village for violating parent's property rights by failing to secure the scene where their daughter's body was hidden. Jury verdict for \$3.75 million February 1, 2001. Case settled after trial for \$2 million. Pre-trial decisions: 65 F.Supp.2d 701 (S.D. OH 1999) (Judge Spiegel) (motion to dismiss denied); 72 F.Supp.2d 865 (S.D. OH 1999); 125 F. Supp.2d. 252 (S.D. OH 2000) (summary judgment denied).

In Re: Northeast Ohio Correctional Center, (N.D. OH 1997 – 2001) (Judge Polster) federal class action litigation on behalf of Washington D.C. inmates housed in a private for-profit prison in Youngstown, Ohio on Eighth Amendment medical, use of force, and failure to protect claims. Case settled for \$1.75 million to be distributed to all 2,000 inmates and a three year agreement to monitor prison conditions. Prison closed in July 2001.

Jane Roe v. Simon Leis, trial 2000, assisted female incarcerated at the Hamilton County Jail in obtaining right to have an abortion in jail by securing injunction in federal Court (S.D. OH) (Judge Dlott) and obtaining written policy change.

Jane Doe v. River City Correctional Center, (S.D. OH 1999) (Judge Dlott), assisted female prisoner in obtaining right to have an abortion by securing TRO in federal court for client to be transported from local correctional center to abortion clinic. Decision at 92 F. Supp.2d 694 (S.D. OH 1999).

McIntyre v. Shea, jury verdict 2000 (S.D. OH) (Judge Perelman), jury did not find that corrections officer watched and failed to protect inmate while he was stabbed several times by another inmate.

Morrison v. Davis, jury verdict 1999, (N.D. OH) (Judge Marbley), Eighth Amendment excessive force case where jury returned \$15,000 verdict for prisoner against corrections officers who beat prisoner. PLRA fee decision reported at 195 F.Supp.2d 1019 (SD. OH 2001).

Glover v. Williamsburg Local School District, trial 1998, federal court trial decision found plaintiff school teacher was fired because of his sexual orientation and ordered reinstatement as a teacher and \$75,000 in compensatory damages. Decision reported at 20 F. Supp.2d 1160 (S.D. OH 1998) (Judge Dlott).

Weil v. Postmaster General, jury trial 1998, (S.D. OH) (Judge Hogan), co-counseled jury trial in sexual harassment case where jury found plaintiff was discriminated against and awarded \$175,000 in compensatory damages.

Partridge v. Fath, jury trial 1994, (S.D. OH) (Judge Rubin), federal race discrimination jury trial on behalf of African-American tenants.

Daugherty v. Wallace, 1992-1993, statewide class action in state court against Ohio Department of Human Services to reinstate General Assistance benefits.

In Re Cincinnati Gas & Electric Co. 1991 & 1993, administrative litigation on behalf of low-income ratepayers in electric rate increase cases. Appeal reported at 67 Ohio St.3d 531, 1993.

Henry v. Korte, 1989-1991, state court class action on behalf of subsidized housing tenants against landlord for violation for substandard housing conditions, and *In Re Korte*, 1991-1993, bankruptcy class action on behalf of class of subsidized tenants to obtain security deposits and new management.

Wells v. CMHA, 1989-1991, (S.D. OH) (Judge Spiegel), obtained consent decree in class action against the metropolitan housing authority to provide federally mandated grievance hearings to tenants.

Heath v. De Courcy, 1989 – 1996, (S.D. OH) (Judge Weber), class action on behalf of local jail prisoners on Eighth Amendment claims and enforcement of consent decree.

OTHER LEGAL EXPERIENCE

Summer 1986 **Law Clerk for S.D.N.Y. U.S. Attorney's Office (Rudolph Giuliani)**

Civil Rights and Appellate Divisions

Summer 1985 **Law Clerk for Federal Magistrate Ila Jean Sensenick (W.D.PA)**

Worked on prisoner rights and social security cases

Summer 1982 **Congressional Intern**

Congressman Austin J. Murphy (S.W. PA)

BAR ADMISSIONS

U.S. Supreme Court (2005)
Ohio Supreme Court (1987)
U.S. District Court for the Southern District of Ohio (1988)
U.S. District Court for the Northern District of Ohio (2004)
U.S. Court of Appeals for the Sixth Circuit (1991)

PROFESSIONAL MEMBERSHIPS

Cincinnati Bar Association
-Grievance Committee (2004-present)
-Labor and Employment Law Committee
-CBA- Black Lawyer's Association Roundtable
-Health Law Committee
-Civil Rights Committee
Cincinnati Employment Lawyer's Association
ACLU Southwest Ohio Chapter Board Member 1993-1996

CIVIC ACTIVITIES

Cincinnati Women's Political Caucus Board Member and Treasurer (1996-1999)
Community Shares Board Member (2005)
Democratic Precinct Executive Cincinnati 14-E (1998-2003), 14-G (2005-present)
Hamilton County Democratic Forum Board Member, Steering Committee Member, Secretary, and President (1992-1998)
Kennedy Heights Citizens on Patrol (2001-2005)
Kennedy Heights Community Council Beautification Committee
Woman's City Club Board Member (1989-1991)

GERHARDSTEIN BRANCH & LAUFMAN
A Legal Professional Association
617 Vine Street, Suite 1409
Cincinnati OH 45202
(513) 621-9100

ANTHONY RIGGINS

Page: 1
08/30/2006
Account No: 6061-00
STATEMENT NO: 1

Interim Statement

		Hours
06/28/2001		
LC	Research - went thru riggins documents from oshp; highlighted materials w/potential evidentiary value; composed index of files, emailed to jb. klk	4.00
06/29/2001		
JLB	Discovery review OHP records, letter to client	0.60
07/09/2001		
PAR	attempt to download docket sheet	0.30
07/12/2001		
PAR	Call Columbus District Clerk to get copy of complaint, fax request, d/i docket	0.50
JLB	Review client documents read client letter and docs and respond	0.30
07/19/2001		
JLB	Draft -- Riggins memo re: no restraints at trail -- bmcg	1.20
09/04/2001		
AAG	General Issues - telephone conference with court re status of riggins, review file, draft notice of appearance and mot ext of time	0.40
10/04/2001		
JLB	Draft respond to show cause, letter to client, draft declaration	0.90
10/24/2001		
JLB	Draft letter to client, AP, meet with paralegal re: service of complaint	0.50
10/26/2001		
PAR	prepare waivers of service, notice of law suit forms. draft correspondence, mail to complete service	1.50
11/30/2001		
JLB	Draft letter to client	0.20



ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
12/14/2001		
JLB	Draft ltr to client	0.30
01/28/2002		
JLB	Draft memo opp to summary judgment, letter to client	1.70
02/02/2002		
JLB	Draft letter to client, stipulation	0.60
03/01/2002		
AAG	General Issues - review mot to dismiss counterclaim	0.30
03/28/2002		
JLB	Research counterclaim motion to dismiss and meet with law clerk	0.20
03/29/2002		
JLB	Draft motion to dismiss counterclaim	2.20
06/26/2002		
JLB	Discovery prepare for depositions, draft subpoena, initial disclosures, ltr to cl.	2.20
07/08/2002		
JLB	Travel to and from Lucasville for depositions (220 miles)	5.00
JLB	Discovery meet with client, review subpoenaed documents, attend deposition of client	6.50
07/18/2002		
LC2	Office conference with Jennifer re: 404(b) admissibility of prison tickets. DLB	0.60
LC2	General Issues - review prior research on 404(b). DLB	0.60
LC2	General Issues - email Lisa Meeks re 404(b) research. DLB	0.10
07/22/2002		
LC2	Research FRE 404(b) admissibility of prior bad acts. DLB	0.40
07/23/2002		
JLB	Discovery draft motion to compel to Warden, draft agreed protective order, draft cover letters	2.50
LC2	Office conference with JB re 404(b) research. DLB	0.20
LC2	Research 404(b) other acts. DLB	7.60
07/24/2002		
JLB	Discovery draft discovery requests to defendants and produce initial disclosures, draft motion to compel, review discovery received.	5.30
LC2	Office conference with JB re 404(b) research. DLB	0.20
LC2	Research FRE 404(b) - other acts evidence. DLB	6.80
PAR	Discovery - meeting with Jennifer Branch regarding preparing discovery documents for depositions DD	0.60

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
PAR	General Issues - look up inmate names and addresses for Hall and Johnson DD	0.30
PAR	General Issues - telephone call to SOCF regarding depositoin of witness Carloe Chaplman DD	0.20
07/25/2002		
LC2	Research FRE 608(b) disciplinary record admissibility. DLB	6.00
PAR	General Issues - filing protective order DD	0.40
07/26/2002		
LC2	Draft research memo re 404(b) admissibility of prison disciplinary record. DLB	2.10
07/29/2002		
LC2	Draft research memo re 404(b). DLB	2.50
07/30/2002		
PAR	Discovery - reviewing discovery documents received from SOCF in response to subpoena to Warrden, bates numbers documents and logging documents into discovery table DD	4.00
LC2	Draft - finish draft of 404(b) admissibility of prison tickets memo. DLB	5.00
07/31/2002		
LC2	Telephone conference with JB re drafting first amended complaint. DLB	0.20
LC2	Telephone conference with JB re summarizing prison tickets. DLB	0.20
LC2	Draft first amended complaint. DLB	3.80
LC2	Review client documents - create summary of offense record. DLB	2.10
08/09/2002		
PAR	General Issues - reviewing documents and entering into Discovery table re: Depositions DD	1.00
08/11/2002		
JLB	Discovery prepare for depositions of defendants	4.00
08/12/2002		
JLB	Travel to and from Portsmouth for depositions of defendants	4.00
JLB	Discovery depose W & G	7.00
08/13/2002		
JLB	Office conference with AAG re: depos	0.20
08/14/2002		
JLB	Draft letter to AP re: photos, research same	1.10
09/03/2002		
JLB	Draft letter to client	0.10
09/15/2002		
JLB	Draft letter to warden	0.20

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
10/14/2002		
JLB	Discovery, review docs, plan for add'l discovery	5.70
10/15/2002		
JLB	Draft to do list, letter to Marianne re: documents	0.50
10/18/2002		
JLB	Draft letter to MAP and motion for extension of time to take depos, review discovery	8.20
10/21/2002		
JLB	Discovery draft letter to MAP re: subpoena and set up depositions	1.00
10/30/2002		
PAR	General Issues - filed Chapman Subpoena DD	0.30
11/04/2002		
JLB	Telephone conference with pressman, draft letter to pressman and witness	0.90
JLB	Telephone conference with pressman, draft letter to pressman and chapman	0.90
JLB	Discovery prepare for depositions	0.50
11/05/2002		
JLB	Discovery prepare for depositions	1.20
JLB	Telephone conference with court, draft memo opp mot to quash, t/c ct, discuss with AAG	1.10
JLB	Discovery prepare for depositions	4.90
PAR	General Issues - filing response to Pressman's motion to quash subpoena of Chapman DD	0.50
JLB	Discovery prepare for deps	3.30
11/06/2002		
JLB	Discovery Depose W & H, prepare for same	5.00
JLB	Travel to and from Portsmouth for depos	4.00
11/07/2002		
PAR	General Issues - filed motion to extend discovery ddl DD	0.50
12/03/2002		
PAR	General Issues - reviewing , bates numbering documents and logging into discovery table. DD	2.50
01/21/2003		
JLB	Draft response to client's mail, draft motion. discovery to do list	1.80
PAR	General Issues - preparing Writ of Habeas Corpus for Riggins to attend FPTC on 2/28/03 DD	0.50

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
01/22/2003		
PAR	General Issues - filing Writ of Habeaus of Corpus DD	0.30
01/23/2003		
PAR	General Issues - telephone call from Steve Snyder re: plaintiff present for FPPTC DD	0.10
PAR	General Issues - t/c to Steve Snyder re: Riggins present at FPPTC and status of order to take depositions past discovery ddl DD	0.10
01/25/2003		
JLB	Draft letter to client, research judgments, read cl letter, create to do list	1.10
02/05/2003		
JLB	Draft Order, supp motion. t/c AL	0.70
02/06/2003		
PAR	General Issues - filing sup. motion to extend discovery ddl DD	0.50
02/19/2003		
JLB	Draft final pretrial order	0.50
02/20/2003		
JLB	Draft pretrial order, memo re: stay	2.50
JLB	Draft letter to client, read cl mail	0.30
02/21/2003		
JLB	Draft letter to counsel re: depositions	0.60
AAG	Trial/hearing - attend conf with court re final pretrial and inmate attendance	0.50
02/28/2003		
JLB	Trial/hearing prepare for final pretrial	1.00
JLB	Trial/hearing attend pretrial	2.10
03/03/2003		
PAR	General Issues - filing notice of appearance of JB as counsel with Sixth Cir. Court of Appeals DD	0.20
03/04/2003		
PAR	General Issues - t/c to Ms. Pressman re: setting time for depositions DD	0.10
03/05/2003		
PAR	General Issues - T/c from Ms. Pressman re: setting time of depositions for 3/17/03 DD	0.10
03/07/2003		
JLB	Draft letter to client	0.30
PAR	General Issues - preparing subpoena's and letters for depos on March 17, 2003 DD	0.80

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
03/16/2003		
JLB	Discovery prepare for Distel and Carter depo	2.80
JLB	Discovery prepare for depositions warden and distel, and Chapman, review discovery	3.00
03/17/2003		
JLB	Travel to and from Portsmouth for depos	4.00
JLB	Discovery prepare for and depose Carter and Distel and Chapman	8.00
04/07/2003		
PAR	General Issues - creating deposition chart for case DD	0.50
05/12/2003		
LC	Research statute of limitations (mailbox rule). dc.	1.50
05/16/2003		
JLB	Draft letter re: setting depo fo Hunt	0.60
05/19/2003		
LC	Research effect on improper venue on statute of limitations. dc.	1.00
JLB	Office conference with law clerk re: research on admissibility of use of force report, email to Steve, t/c to David, draft notice of appearance, letter to client	1.10
LC2	Research admissibility of use of force committee report for jennifer- dd	8.00
05/20/2003		
LC	Research statute of limitations issue. dc.	1.50
LC2	Research westlaw searches for 'trustworthiness' in use of force cases for Riggins case (for Jennifer)- dd	3.50
05/21/2003		
LC	Draft -- finish researching & draft memo regarding statute of limitations. dc.	3.50
LC2	Research -Riggins, Use of Force admissibility- dd	3.50
05/22/2003		
JLB	Office conference with law clerk re: evidence research on 803(8)	0.40
LC	Research when pro se complaint was filed. dc.	1.00
LC2	Research -Riggins case for Jennifer, admissibility of the Use of Force Committee Report. dd	6.00
05/28/2003		
LC	Telephone conference with Mary Highfield (twice) regarding status of client's account when he was at OSP. dc.	0.20
06/18/2003		
JLB	Draft edit subpoena	0.30
06/24/2003		
PAR	General Issues - indexing depo of Gannon DD	4.50

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours	
07/08/2003			
JLB	Draft subpoena, ltr to Hoover, review subpoenaed records	0.60	
LC	Research -- talked w/ JB and began research for Riggins re: appearance in courtroom -- bmcg	1.00	
07/17/2003			
PAR	General Issues - t/c from Hoover Law offices re: setting Hunt depo DD	0.10	
07/18/2003			
PAR	General Issues - drafting notice of depo for Hunt on 8/19/03 DD	0.10	
08/01/2003			
PAR	General Issues - t/c from Wendy at Hoover's office re: resetting Hunt's Depo DD	0.10	
08/04/2003			
PAR	General Issues - t/c to Wendy at Hoover Law Group re: reset Hunt Deposition DD	0.10	
08/06/2003			
PAR	General Issues - t/c to Wendy at Hoover law Group re: reset Hunt deposition DD	0.10	
08/07/2003			
PAR	General Issues - t/c from Vanessa at Hoover Law Group re: reset Hunt Deposition date DD	0.10	
	PAR	General Issues - prepare notice of depo for Hunt on 9/17/03 DD	0.10
08/28/2003			
JLB	Discovery review discovery, witnesses, ltr to counsel re: same, ltr to client	1.40	
08/29/2003			
JLB	Discovery review documents from defendants	0.50	
JLB	Draft letter to Hoover, review discovery	0.70	
09/02/2003			
PAR	General Issues - bates stamping and logging inmate account statement DD	0.10	
PAR	General Issues - preparing draft of Plaintiff exhibits and joint exhibits for trial DD	0.90	
09/08/2003			
LC2	Discovery - depo index for Wells - cd	6.00	
09/11/2003			
JLB	Telephone conference with Carol Re: case plan	0.60	

ANTHONY RIGGINS

Page: 8
 08/30/2006
 Account No: 6061-00
 STATEMENT NO: 1

		Hours
09/12/2003		
LC	Review client documents -- reviewed medical and disciplinary file for memo on restraints in courtroom -- bmcg	1.00
LC	Discovery - indexing Wells deposition - ckl	1.50
LC	Discovery - indexed Well's deposition - cd	3.00
09/15/2003		
AAG	General Issues - conf on case with cocounsel	1.30
LC2	Discovery - index deposition for Garner - cd	1.60
LC	Discovery - indexing Wells deposition - ckl	1.50
JLB	Discovery prepare for Hunt depo and draft trial outline, meet with AAG and Carol re: plan	6.00
09/16/2003		
JLB	Telephone conference with Hoover re: change depo time	0.30
JLB	Discovery prepare for deposition	4.50
LC2	Discovery - indexed Carter deposition - cd	3.80
09/17/2003		
JLB	Discovery depose Hunt (3), set trial date, discuss jt exhibits with counsel	3.40
LC2	Discovery - indexed Chapman deposition - cd	1.80
LC	Discovery - indexing Distel deposition - ckl	2.00
09/19/2003		
LC2	Discovery - worked on indexing Chapman deposition - cd	1.50
LC	Discovery - indexing Distel deposition - ckl	3.50
09/22/2003		
LC	Discovery - indexing Distel deposition - ckl	2.00
LC2	Discovery - finished indexing Chapman deposition - cd	4.40
LC	Discovery - indexing Hunt deposition - ckl	2.00
09/24/2003		
LC	Research on admissability of prior convictions and disciplinary actions while in prison for motion in limine - ckl	3.00
09/25/2003		
LC	Review client documents -- Riggins RIB file -- figure out what code infractions are -- bmcg	1.00
09/26/2003		
LC	Research and writing motion in limine on issue of admissability of prison disciplinary record - ckl	4.00
09/29/2003		
LC	Drafting motion in limine to keep out disciplinary record - ckl	1.00
10/23/2003		
JLB	Draft ltr to Pressman re: witnesses, ltr to inmates, ltr to Hoover, review inmate witness file and find current locks	1.00

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
10/24/2003		
LC	Discovery - indexing Hunt's Vol. II deposition - ckl	3.80
10/27/2003		
LC	Discovery - completed index of Hunt Vol. 2 deposition - ckl	4.60
11/03/2003		
JLB	Draft 4 subpoenas & witness ltr, t/c with MAP (.2), [total time 1.4 hours, billed only .5)	0.50
JLB	Draft motion in limine re: convictions, RIB record, witness list and exhibits that were not produced, prepare trial plan	2.30
11/04/2003		
JLB	Draft response to motion in limine on most of plaintiff's exhibits, draft jury instructions,	3.00
JLB	Draft jury instructions	1.00
11/05/2003		
JLB	Draft trial plan, create trial notebook, outline Distel DE	1.90
AAG	General Issues - meet with jennifer re strategy and witness order and theory, review videos	1.80
LC	Trial/hearing - creating exhibit file - ckl	3.80
JLB	Office conference with AAG re: trial plan (2), create exhibits, review discovery, t/c with witness (.1), draft jury instructions, draft motion to change caption, draft habeas motion, ltr to counsel re: restraints, t/c MAP (.2) re: restraints, subpoenas,	7.30
11/06/2003		
JLB	Trial/hearing meet with clerk re: medical records and exhibits	0.40
JLB	Trial/hearing prepare DE client, finalize JI	0.80
LC2	Discovery - reviewed medical records for trial preparation- dld	2.00
11/07/2003		
LC	General Issues -- re-batsed documents for exhibit folders; copied and compiled binder for AG -- bmcg	4.00
LC	Review client documents -- copied and batsed medical records for exhibit folders; made chart for medical records -- bmcg	1.20
JLB	Travel to and from SOCF to meet with client	4.00
JLB	Meeting with client, prepare for meeting,	3.00
JLB	Discovery digital photo review, t/c Pressman re: protective order	0.40
11/10/2003		
JLB	Telephone conference with witness	
JLB	Trial/hearing review client's medical records and summarize	1.50
LC	General Issues - finishing exhibit books - ckl	0.80
JLB	Draft memo in opp to motion in limine	2.30
JLB	Draft habeas Johnson	0.40

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
11/11/2003		
JLB	Trial/hearing prepare DE client	1.00
JLB	Trial/hearing read def exhibit book, prepare depo transcript filing, double check pl. exhibit books	1.00
JLB	Trial/hearing prepare client DE	1.40
JLB	Trial/hearing prepare DE Johnson	2.10
JLB	Trial/hearing read Def oppositon to motion in limine	0.60
AAG	General Issues - review depositions and exhibits, review case theory and plan themes and outline witness ideas	7.00
11/12/2003		
JLB	Trial/hearing review def exhibits, filings, organize def exhibit book	1.50
JLB	Trial/hearing prepare for trial, DE chapman, t/c AAG re: plan and strategy, review research on evidence, draft objections	6.40
JLB	Draft rule 11 ltr, review documents in support	1.10
LC2	Discovery - Putting in order, Indexing and tabbing defense exhibit book - trying to obtain information re: Hunt's assignment through the National Guard in March and April of 2003 - ckl	3.40
LC2	Review client documents - looked through jury questionnaires to ensure they were all there- dld	0.40
11/13/2003		
AAG	General Issues - conf with JB	0.50
AAG	General Issues - outline testimony for trial	0.90
JLB	Office conference with AG re trial plan	0.50
11/14/2003		
LC	Discovery -- went to Kinkos to print pictures for Riggins Hearing -- bmcg	1.00
AAG	Trial/hearing - review issues for pretrial, examine deft book, participate in pretrial re motions in limine	2.80
LC	Review client documents -- went through exhibit binder to look for docs that had writing on them, and recopied clean docs as needed; went to Kinkos to make copies of pictures -- bmcg	1.30
LC	General Issues -- copied relevant pages for exhibit book; went to Fed Ct.House to update exhibit books w/ correct pages and return book to clerk -- bmcg	0.70
LC	General Issues -- went to Kinkos to copy pictures for exhibit books; copied Defense exhibit book for AG -- bmcg	1.50
LC	Discovery - organizing and indexing pleadings file - ckl	0.60
AAG	General Issues - trial prep - review defense exhibits, review witness order with jb	2.00
AAG	General Issues - READ EXHIBITS	1.60
JLB	Trial/hearing prepare for trial, review case plan with AAG, review Def exhibits book	2.00
JLB	Trial/hearing attend pretrial on def exhibits and mot in limine	1.00
JLB	Trial/hearing prepare for trial review def exhibitis, meet with AAG, review jury questionnaires and take notes (2.5), read depos, prepare witness examinations	7.60

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
11/15/2003		
JLB	Trial/hearing prepare for trial summarize jury info (.5), prepare witness DE, Chapman, Distel, Wells, Gannon, Hunt, cl DE,	8.60
AAG	General Issues - review use of force reports, read carter depo and outline ideas for carter and hunt	2.50
11/16/2003		
JLB	Trial/hearing trial prep, XE ideas Carter,	1.10
AAG	General Issues - review memo from opposing counsel re new exhibit and memos from JB re trial ideas	0.30
AAG	General Issues - prep gannon, prep distel, start review of voir dire, prep carter outline, decide re video	7.10
JLB	Trial/hearing preparation, DE Carter, review psychology records, Def exhibits, draft memo opp to Def exhibits	7.70
JLB	Trial/hearing preparation - DE Wells, closing dies, draft memo opp to def exhibits, draft opening	6.20
11/17/2003		
JLB	Trial/hearing prepare opening	1.50
LC	Research - copy exhibit book and tab new one - cd	2.00
AAG	Trial/hearing - prep for and attend day one of trial and meeting with client	11.80
AAG	General Issues - prep demo of cell, review def opening with JB and make adjustments, rework gannon direct, rework distel	5.30
JLB	Trial/hearing Attend day one trial - voir dire, do opening, argue exhibits. Meet with client (2). Meet with AAG re plan, witness DE, demonstrative evidence, edit DE Gannon, Wells, Riggins, review medical files, review Hunt depo	14.70
11/18/2003		
JLB	Trial/hearing prepare for trial, edit Gannon DE, edit Riggins DE, read Hunt depo, edit Wells DE	2.10
AAG	Trial/hearing - prep for and attend day two of trial	10.60
JLB	Trial/hearing attend Day 2 of trial - Gannon, XE Wells, Distel, DE client, DE Parks, meet with client	8.70
JLB	Trial/hearing meet with AAG re: strategy	1.50
JLB	Trial/hearing read Hunt depo, prepare Chapman XE, Wells WE, Harris XE, Little XE	1.60
AAG	Trial/hearing - prep for wed witnesses	6.20
11/19/2003		
JLB	Trial/hearing preparation for day 3 - prepare crosses of witnesses, thoughts on closing, review law for charge conference	2.50
AAG	Trial/hearing - prep for and attend day three of trial	11.30
JLB	Trial/hearing Day 3, Carter, XE Harris, rule 50 motion. Enter exhibits. Charge conference. Meet with client. Prepare for closing, research cases, meet with AAG, read trial notes and exhibits. Create admitted ex. books,	14.80
AAG	Trial/hearing - review all material and prep closing	5.60

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
11/20/2003		
JLB	Draft email of research assignment to clerk, ltr to Mary Highfield	0.20
JLB	Trial/hearing edit closing, read trial notes, research on JI	1.30
AAG	Trial/hearing - complete prep for last day trial, attend and do closing. meet with client	7.70
JLB	Trial/hearing Day 4 - JI, closing, wait for Jury, answer jury question, research mistrial, write and make proffer, move for mistrial, meet with client	8.30
AAG	Trial/hearing - respond to jury question, research motion mistrial and make proffer and motion with JB, conf client	2.50
LC	General Issues -- tried to find missing exhibit tape for trial -- bmcg	0.80
LC	Research -- re: FRCP 11 for Riggins -- bmcg	0.50
11/21/2003		
AAG	Trial/hearing - research law re mistrial, go to court for question and argument on curative instruction, go to court for verdict	4.30
LC	Research -- FRCP 11 for Riggins -- bmcg	1.00
LC	Research -- various issues re: jury instructions/ curative instructions, etc. -- bmcg	3.00
JLB	Meeting with client before verdict re: mistrial and proffer	0.70
JLB	Trial/hearing question #2 from jury, curative instruction, await verdict, receive verdict, renew motion for mistrial, meet with client after verdict	4.50
11/22/2003		
JLB	Office conference with AAG re: mistrial, new trial motion, whether to try case again	1.00
JLB	Draft memo in support of motion for mistrial, research same	4.20
AAG	General Issues - review issues re trial with JB, research mistrial, begin memo	2.70
AAG	Draft edits to memo and file same	2.00
11/24/2003		
LC	Research and drafted motion for new trial - cd	1.50
LC	General Issues - tracked down Hunt's military service in the year 2003 (approx. 1.5 hours), wrote declaration re: what I found out about Hunt's service dates (.5 hours), researched Rule 11 and Section 1927 motions (approx. 1.9 hours)	3.90
11/25/2003		
JLB	Draft ltr to client re motion for new trial	0.30
JLB	Office conference with AAG re: judgment, motion for new trial	0.40
JLB	Research motion for new trial	0.40
11/26/2003		
LC2	Researched for motion for new trial - cd	5.00
12/01/2003		
JLB	Review client documents read client's letters	0.40
JLB	Office conference with clerk re: New trial research	0.30
LC	General Issues - closing file - ckl	3.30

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
	LC General Issues - running - got cross-examination transcript for Dlott's chambers - ckl	0.40
12/03/2003		
	LC Research - for motion for new trial - closing argument, cross-examination, and against the weight of the evidence - ckl	3.30
	JLB Research review new trial research	0.30
12/04/2003		
	JLB Draft motion for new trial and research same	4.20
12/05/2003		
	JLB Draft motion for new trial and research same	1.10
	LC Research on 2 Sixth Circuit cases in def. reply to motion for mistrial - ckl	0.50
	AAG Draft edits to mot for new trial	0.40
	JLB Draft motion for new trial	7.10
12/09/2003		
	JLB Draft reply to memo on mistrial, draft motion for sanctions	0.90
12/10/2003		
	JLB Draft reply on mistrial and mot sanctions	2.10
12/11/2003		
	JLB Research motion for sanctions	1.90
12/12/2003		
	JLB Draft edit motion sanctions and file	0.40
12/29/2003		
	JLB Draft reply on sanctions motion, file, draft letter to client, read client letters	1.20
01/27/2004		
	LC Research Rule 11 motion- rjm	2.00
	LC Draft rule 11 motion- rjm	2.00
01/29/2004		
	LC Draft rule 11 motion-rjm	2.00
02/13/2004		
	LC2 Research -- peremptory challenge--appeal? DS	3.00
02/23/2004		
	JLB General Issues read Order, draft ltr to client	1.00
03/18/2004		
	LC2 Research and drafted a memo about defendant hunt's motion to stay proceeding under the "servicemembers civil relief act"- dld	6.00

ANTHONY RIGGINS

Account No:
STATEMENT NO:

		Hours
03/25/2004		
PAR	Research -JAG Orders	1.00
03/31/2004		
JLB	Draft memo opp motion for stay	1.20
04/13/2004		
LC2	Researched 1927 claims against defense attorneys for mistrial.--eqs	3.00
07/06/2004		
AAG	Telephone conference with court re status of hunt in Iraq	0.20
01/31/2005		
JLB	Draft ltr to Public defender	0.30
05/04/2005		
JLB	Draft ltr to client, calendar dates	0.20
10/11/2005		
AAG	Trial/hearing - conf with court	0.20
JLB	Telephone conference with court - set new trial date, ltr to client	0.70
10/16/2005		
JLB	Draft ltr to client re effect of criminal case	0.30
11/01/2005		
JLB	Draft ltr to client, fees, edit	0.40
11/28/2005		
JLB	Draft ltr to client	0.10
01/17/2006		
JLB	Draft memo opp motion to dismiss	3.80
LG	Research on Riggins motion in limine AP	2.50
01/18/2006		
LG	research on motion in limine AP	7.20
01/19/2006		
JLB	Review Wtson procedures, draft FPTO and enter deadlines in calendar	2.20
01/24/2006		
LG	research on motion in limine AP	3.80
01/25/2006		
LG	Research	1.70
02/16/2006		
JLB	Discovery review trial notes and exhibits in prep for cell viewing	0.80
JLB	Discovery look at cell in storage	2.00

ANTHONY RIGGINS

Account No:
STATEMENT NO:Page. 15
08/30/2006
6061-00
4

		Hours
02/24/2006		
PAR	General Issues chronology of incident	1.10
PAR	General Issues create chronology for re-enactment	2.80
03/07/2006		
JLB	Telephone conference with Ray Hamilton re cell	0.10
03/14/2006		
JLB	Trial/hearing review depo testimony and draft re-enactment	1.50
PAR	General Issues update chronology w/riggins testimony	1.90
PAR	General Issues re-enactment	1.00
AAG	General Issues - travel to cell and do reenactment	1.60
JLB	General Issues travel to cell and do re-eneactment	1.50
03/23/2006		
PAR	General Issues update chronology	1.50
03/27/2006		
PAR	General Issues update chronology	0.20
03/30/2006		
PAR	General Issues update incident chronology	1.10
03/31/2006		
JLB	Research evidence re action inside cell	0.30
06/05/2006		
AAG	General Issues - prep for and conf court and defense counsel and conf branch	1.00
07/05/2006		
PAR	General Issues copy and mail transcripts	0.20
07/13/2006		
PAR	General Issues index trial testimony	1.80
07/17/2006		
JLB	Trial/hearing prepare for and attend pretrial	3.60
08/09/2006		
PAR	General Issues trial subpoenas, cover letters	2.40
08/10/2006		
JLB	Draft and research pl motions in limine	3.50
08/11/2006		
PAR	General Issues prrof and file pleadings, print docs	1.60
JLB	Draft read and respond to def mot in limined, draft PI motions in limine, habeas	3.00

ANTHONY RIGGINS

Page: 10
 08/30/2006
 Account No: 6061-00
 STATEMENT NO: 1

		Hours
08/14/2006		
AAG	General Issues - conf JB re strategy	1.00
PAR	General Issues exhibit binders	1.20
JLB	Trial/hearing pretrial with court	1.50
JLB	Trial/hearing trial prep	6.00
08/15/2006		
PAR	General Issues exhibit books	3.90
JLB	Trial/hearing trial prep, exhibits	4.00
08/16/2006		
JLB	Draft memo on convictions	1.00
JLB	Trial/hearing TRIAL PREP, EXHIBITS, pretrial (1 hr), jury instructions, trial plan	5.00
PAR	General Issues redact exhibit 5, fix Judge's binder, redact photos	3.40
08/17/2006		
PAR	General Issues video to Lintel, pix to mmp, redact exhibits, double check binders	2.10
08/18/2006		
AAG	Draft edits to statement of case and think about us eof force	0.30
AAG	General Issues - trial plan discussion with JB	1.10
JLB	Trial/hearing exhibits, trial strategy mtg with AG, opening, DE cl, DE chapman, t/c MAP re witness order, travel to LeCi (1), Meet with client (3)	12.50
AAG	General Issues - trial prep - review warden cross, issues re riggins direct	0.50
AAG	General Issues - discuss case strategy - cross wells and facts re calls to distoll	0.20
08/19/2006		
JLB	Trial/hearing prepare for trial, discuss strategy with AG, t/c MAP glasses, draft motions, edit DE carter, DE client, prepare XE defendants, DE Chapman, prepare closing, study jury instructions	6.70
08/20/2006		
JLB	Trial/hearing opening, Carter DE, Riggins DE, jury slection, defendnatn XEs, Distel, Chapman, Medical,	14.70
08/21/2006		
JLB	Trial/hearing prep - voir dire, opening,	0.90
JLB	Trial/hearing pack up, meet with client. Trial day 1	10.70
JLB	Trial/hearing prepare for Day 2	1.20
08/22/2006		
JLB	Trial/hearing prep for day 2, day 2 of trial, prep for closing and XE Harris	15.50
08/23/2006		
JLB	Trial/hearing prepare closing. Trial Day 3	12.80

ANTHONY RIGGINS

Page. 17

08/30/2006

Account No: 6061-00
STATEMENT NO: 1

		Hours	
08/24/2006			
JLB	Trial/hearing Jury Questions, verdict, talk to jury, travel to and from LeCl and meet with client	4.50	
AAG	Trial/hearing - attend session with questions and receive verdict and talk to jury	2.70	
08/28/2006			
JLB	Draft motion for fees, review timesheets	1.50	
	For Current Services Rendered	788.90	107,437.75

RECAPITULATION

	Hours	Hourly Rate	Total
Gerhardstein, A.A.	108.20	\$169.50	\$18,339.90
LAW GRADUATE	15.20	85.00	1,292.00
Law Clerk	80.00	65.00	5,200.00
Law clerk 2	101.30	65.00	6,584.50
Jennifer Branch	426.30	169.50	72,257.85
LAW CLERK	8.70	65.00	565.50
PARALEGAL	49.20	65.00	3,198.00

07/23/2001	TREASURER, STATE OF OHIO - COPY OF PUBLIC RECORDS REQUEST	4.73
10/05/2001	Filing Fee CLERK, U.S. DISTRICT COURT	150.00
08/02/2002	ROUND TRIP TO SOCF - JB	79.35
10/22/2002	Witness fee - CAROLE CHAPMAN	
11/04/2002	SOUTHERN OHIO CORRECTIONAL FACILITY - COPIES OF POLICIES & VIDEO TAPES	17.46
11/23/2002	UPS - Overnight Mail	10.88
11/23/2002	COPIES & POSTAGE - SOUTHERN OHIO CORRECTIONAL FACILITY	22.95
12/30/2002	Mileage - 9/19/02 Travel to SOCF; 11/6/02 - Travel to Portsmouth - JENNIFER BRANCH	140.04
02/10/2003	Depositions: Jerry Wells, Anthony Gannon, Forrest Hunt, III - DRAPER & OESTREICHER	1,251.20
03/03/2003	UPS - Overnight Mail	10.88
03/07/2003	Witness fee - LT. CARL DISTEL	53.14
03/07/2003	Witness fee - HAROLD CARTER	50.95
03/07/2003	Witness fee - CAROLE CHAPMAN	40.00
03/15/2003	UPS - Overnight Mail	10.91
05/03/2003	Depositions: Harold Carter, Carole Chapman - DRAPER & OESTREICHER	1,099.60
10/30/2003	Depositions of Forest Hunt - DRAPER & OESTREICHER	542.80
11/03/2003	Witness fee - CAROLE CHAPMAN	126.40
11/03/2003	Witness fee - CARL DISTEL	126.40
11/03/2003	Witness fee - HAROLD CARTER	126.40
11/03/2003	Witness fee - RECORDS CUSTODIAN	126.40
11/15/2003	Exhibit book copies - MMP PRINTING MINUTE MAN PRFSS	208.65
11/25/2003	BETTY SCHWAB - Transcript of opening statement	39.60
11/25/2003	UPS - Overnight Mail	20.95

ANTHONY RIGGINS

Page: 18
 08/30/2006
 Account No: 6061-00
 STATEMENT NO: 1

12/02/2003	Partial transcript of trial - BETTY J. SCHWAB	110.00
12/02/2003	KINKO'S	196.88
12/02/2003	Meals during trial	211.72
12/11/2003	UPS - Overnight Mail UNITED PARCEL SERVICE	20.82
12/30/2003	Meals - Trial	64.56
12/30/2003	Meals - Trial	13.25
02/09/2004	Mileage & copies - JB	83.54
03/09/2004	UPS - Overnight Mail	11.25
03/15/2006	Professional Services - ASSISTANT WITH STORAGE & ASSEMBLE JAIL CELL - RAY HAMILTON CO. MOVERS	430.50
04/12/2006	Professional Services - RAY HAMILTON CO. MOVERS	39.00
06/26/2006	Professional Services - trial transcript - CONNIE PORTER, COURT REPORTER	210.00
08/09/2006	Witness fee - Harold Carter	126.29
08/09/2006	Witness fee - Carol Chapman Roberts	126.29
08/09/2006	Witness fee - Carol Distel	126.29
08/09/2006	Witness fee - Mona Park	126.29
08/24/2006	CONNIE PORTER - COURT REPORTER - TRIAL TRANSCRIPT	100.00
08/24/2006	UPS - Overnight Mail	54.82
	TOTAL EXPENSES	6,311.31
	TOTAL CURRENT WORK	113,749.06
	Balance Due	\$113,749.06